

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: EDWARD FRANKLIN DABNEY and	:	CHAPTER 13
ANGELEA MICHELLE JONES	:	
Debtor(s)	:	
	:	
JACK N ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
EDWARD FRANKLIN DABNEY and	:	
ANGELEA MICHELLE JONES	:	
Respondent(s)	:	CASE NO. 1-20-bk-00555

TRUSTEE’S OBJECTION TO FOURTH AMENDED CHAPTER 13 PLAN

AND NOW, this 2nd day of September, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)’ plan for the following reason(s):

1. Debtor(s)’ plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required. More specifically,

Trustee alleges and avers that debtor(s)’ disposable income is greater than that which is committed to the plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. Vehicle operation expense exceeds allowance - Line 12.
- b. Actual taxes incurred with tax refund adjustment - Line 16.
- c. Childcare (verification) – Line 21.
- d. Contribution to care of family members (verification) – Line 26.
- e. Qualified retirement deductions (verification) – Line 41.

2. Trustee avers that debtor(s)’ plan is not feasible and cannot be administered due to the lack of the following:

- a. Proof of Claim for Acceptance Now.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/James K. Jones  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 2nd day of September, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Dawn Marie Cutaia, Esquire  
115 East Philadelphia Street  
York, PA 17401

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee